

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

THE UNITED STATES OF AMERICA

v.

No. 1:16-cr-00065-SM

ROBERT BRUNK

ASSENTED TO MOTION FOR A FURTHER ONE-DAY EXTENSION OF
DEADLINE FOR FILING OF THE DEFENSE SENTENCING MEMORANDUM
AND MOTIONS FOR DEPARTURE OR VARIANCE

The Defendant, Robert Brunk, through counsel, respectfully submits this Assented to Motion for a Further One-Day Extension of the Deadline for Filing of the Defense Sentencing Memorandum and Motions for Departure or Variance.

In support of this motion the defense states:

1. The sentencing hearing in this case is scheduled for August 31, 2016. Undersigned counsel had previously submitted a motion, which was granted, to extend the deadline to file the defense sentencing memorandum to Monday, August 22, 2016.

2. Defense counsel was traveling out of state until Sunday, August 21, 2016. Upon returning, counsel was in contact with Mr. Brunk to further discuss the defense sentencing pleadings. Those efforts took longer than expected.

3. The defense was not able to file the motion on Monday, August 22, 2016. The motion was filed the next morning, Tuesday, August 23, 2016.

4. Counsel seeks a further one-day extension of the deadline, to Tuesday, August 23, 2016 so that the defense requests are timely filed.

5. Assistant United States Attorney Georgiana Konesky assents to the requested extension.

6. Granting this extension will not affect the scheduled sentencing hearing date or any other scheduled hearings or deadlines.

WHEREFORE, the defense requests an extension to Tuesday, August 23, 2016, for filing the defense sentencing memorandum and motions for departure or variance.

Date: August 24, 2016.

Respectfully submitted,

/s/Richard Guerriero
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CERTIFICATE OF SERVICE

I certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on the date the document was signed by me.

/s/ Richard Guerriero